CUMULATIVE INDEX

to

OIL & GAS TAX QUARTERLY

VOLUME XXXI: Nos. 1 to 4

CONTENTS

Subject Matter Index 228

Table of Current Cases Digested 237

Table of Cited Cases 239

Table of Cited Administrative Rulings 249

Author Index 255

SUBJECT MATTER INDEX

[References are to pages]

..A..

Auditing
- Confidential client information 443
- CPA-client relationships 440
- Disclosure 922
- IRS subpoena power 440
- Workpapers as evidence in tax cases 444

..B..

Bonus Payments
- Advance royalties 134
- Bonus lease payments 126
- Delay rentals 134, 876
- Installment method 129
- Lease bonus payments 126, 874
- Lump-sum method 129
- Minimum royalties 134, 878

..C..

Charitable Contributions
- Deduction limitation 16, 21

..D..

Damages
- Payments 885

Depletion
- Advanced cost depletion allowance 888

Advanced royalties 255
Cost depletion 255, 888
History 256
Independent producer 260
Lease bonuses 255
Mismatching of income 276
Percentage depletion 253, 255, 896
Royalty owner 260
Safe harbor leasing 517
Subchapter S 516
Tertiary production 250

Disclosure
Audit implications 159, 174
SAS No. 27—supplementary information 160
SEC requirements 158
Supplementary information 165
Timberland 157

. . E . .

Economic Recovery Tax Act of 1981
Accelerated Cost Recovery System (ACRS) .. 339, 387, 646, 852, 862
"At risk" 353
Charitable contribution limitation 16, 21
Deferment of estate taxes 51
Estate tax provisions 747
Leasing 352
Newly discovered oil 269
Pollution control investments 338, 356
Research and experimentation credits 243
Safe-harbor rules 353
Section 6166 51
Section 6166A 51

Education
AICPA 619
Graduate tax education 609, 611, 630
Natural resource taxation 604, 615, 630

Estate and Gift Tax
Annual gift tax exclusion 32
"Clifford" trust 37
Closely held business 748
Family partnerships 45
Farm-outs 38
Installment payments 51, 745

Inter vivos transfers 42
Irrevocable trusts 36
IRS position on deferral 750
Marital deduction 33
Planning for oil and gas interests 31, 745
Private annuities 39
Recapture 32
Revocable or "living" trusts 39
Section 6166 745
Transfers at death 41
Valuation of oil and gas properties 46, 50
Working interest gifts 35

. . F . .

Federal Energy and Mineral Resources Act of 1982 ..... **101**

Federal Royalties and Rents Collection Act of 1981 ..... **98**

Foreign Companies and Taxes
Algerian supreme court 143
Algeria—oil and gas taxation 137
Carryback and carryover of excess taxes 807
Creditable foreign income taxes 826
Credit limitations 792
Dividends 797
Foreign oil and gas extraction income (FOGEI) 794
Foreign oil-related income (FORI) 794
Foreign tax credit 518
Income tax considerations 523, 596, 762
Indirect credit 785
Information Release 1638 772
"In lieu of" tax 782
Interest 797
Loss recapture rules 569
Nonextraction oil activities 547
Oil-related losses 556
OPEC 769
Privilege tax 776
Recapture of foreign losses 819
Royalties 766
Saudi Arabia 768
Section 907 limitations 802, 806
Subpart F income 523
Taxation of oil and gas income 762

Tax credit 765, 772
Tax credit limitation 551
TEFRA 546

. . I . .

Indians
Exemptions from federal income taxation 68
Federal policy 59
Oil and gas royalties 87, 91
Royalty management 92
Tax status 61, 62
Windfall profit tax 54

Inflation Accounting
Current-cost disclosures 922

Intangible Drilling Costs
Alternate minimum tax 503, 742
Current expensing 735
Defined 321
Election 325
Historical perspective 323
Impact of TEFRA 503, 733, 737
Non-election 574
Offshore drilling 320, 331
Partnership 113, 741
Prepaid IDC 526
Pre-TEFRA treatment 734
Recapture 328
Risk of drilling 544
Safe-harbor leasing 512
Section 58(i) elections 738
Section 704 ..... 106, 113
Special allocations 106
Tax-planning considerations 114
Tax Reform Act of 1976 118
Timing 326

Investment Tax Credit
Industrial development bonds 389
Pollution control investments 347
Recapture 358
Section 38 property 388

Section 169 amortization 385
Useful life 387

. . L . .

Leases
Assignment 831, 841
Avoiding sublease treatment 831
Bonus 838
Farm-out 836
Gulf of Mexico/OCS Land 905
Negotiating 891
Nonoperating interest 845
Overriding royalty 841
Partnership 844
Planning techniques 839
Tax suggestions 891
Working interest—retention 847, 849

. . O . .

Oil and Gas Properties
Acquisition costs 238
Average daily production 405
Conservation 902
Depletion on tertiary production 250
Development costs 239
DOE concept 402
Environmental damage 427
Equipment 856
Gift of 32
Investment decisions 449
Mineral reserves 163, 176
New identifiable facility 366
Pollution control facilities 361, 373, 381, 384
Research and experimentation credits 243
SAS No. 33 151
SEC disclosure requirements 158
SFAS No. 19 152
SFAS No. 25 151
SFAS No. 39 150
Supplementary energy reserve information 150
Tertiary injectant costs 243
Tertiary recovery projects 235
Valuation at a transfer date 46, 50

Working interest 279

Oil and Gas Tax Accounting

Accelerated cash flow 279
ACRS recovery period 343, 866
Ad valorem tax 883
Alternative minimum tax 742, 867
"At risk" rules 585
Bonuses 874
Capitalized costs 916
Changing prices 669
Contribution-distribution treatment 306
Current-cost information 921
Damage payments 885
Debt-financed income 593
Deferred taxes 648
Delay rentals 876
Disclosure requirements 653, 657, 678, 911
Disposition of real estate 858
Distortion of income 538
Earnings and profits 588
Easement rights 882
Economic impacts 895
Equity method 453, 459, 667
Expensing 898
Exploration activities 458
Exploration rights 882
Guaranteed payment treatment 285
Historical-cost/constant-dollar 668
Institutional investors 579
Interest capitalization 455, 458
Interest costs 452
Interperiod tax allocation 646
Investment tax credit 347, 852
Leasing 352, 376, 831
Minimum tax 870
Nonrecognition rules 854, 862
Production payments 583
Resource waste 424
Pooling 757
Product financing arrangements 672
Purchase obligations 678
Reserve quantities disclosure 915
Reserve recognition 912
Saudi Arabia 768
SEC disclosure requirements 923
SFAS No. 34 452

SFAS No. 47 679
SFAS No. 49 673
SFAS No. 69 ..... 654, 658
State "oil-only" taxation 413
Sublease treatment 831
Taxation 852, 895
Temporary interruption payments 884
Trade-ins of equipment 856
Unitization 757
Working interests 581

. . P . .

Partnership
IDC 741
Investing vehicle 589
Leases 844
Production payments 13
Proportionate investment 312
Subchapter S 510, 515
Taxation 280, 288
Windfall profit tax 14, 513

Percentage Depletion
Charitable contributions 16, 22
Dividends received deduction—interaction 16, 22
Primary rates 34
Secondary and tertiary rates 34
Section 613 ..... 22, 23
Sixty-five percent limitation 23
Tax Reduction Act of 1975 31
Transfer of "proven properties" 33
Working interest gifts 35
Windfall profit tax 640

. . R . .

Royalty
In advance 876
Minimum 878, 881
Payments 139, 876

Petroleum 138

. . S . .

Safe-Harbor Leasing
Depletion 517
IDC 512
TEFRA 398

Subchapter S
Depletion 516
Partnerships 510
Subchapter S Revision Act of 1982 505
TEFRA 503

. . T . .

Tax Equity and Fiscal Responsibility Act of 1982 (TEFRA)
Alaska Native Claims Settlement Act 525
Alternate minimum tax 503
Carryover and carryback rules 565
FORI 560
IDC 733
ITC basis adjustment 395
Loss recapture rules 569
Nonextraction oil activities 547
Pollution control investments 338, 397
Safe-harbor leasing changes 398
Section 907 amendments 546
Subchapter S 503
Tax preferences 587
Trans-Alaska Pipeline System 524

Taxes
Ad valorem 883
Custom duties 144
Direct petroleum tax 140
Excess profits 437
Oil and gas investment decisions 649
"Oil-only" taxation 413
Penalties for tax offenses 148
Regressive 416
Section 179 writeoff 854
Tertiary recovery projects 235
Turnover taxes 144
Unitary 435

Tax Reduction Act of 1975
Small producer's exemption 31

Tax Reform Act of 1976 ..... 118, 327, 367

. . W . .

Windfall Profit Tax
Applicability 638
"As-if" basis 8
"As-if" depletion 8
Background 637
Declared unconstitutional 637
DOE concept of property 3, 402
Economic impact 900
ERTA amendments 401
Fifth Amendment challenge 643
Form 843 13
Form 6249 13
Imposition 639
Incremental tertiary oil 247
Independent producer 58, 124
Indian oil exemption 54, 80, 85
Minimizing 121, 122
Net income limitation 1, 12
Partnerships 14, 513
Production payments 13
Refunds 644
Royalty interests 35
Royalty oil exemption 57
Section 4992 125
Stripper well 401, 409
Termination 640
Tier I, II, III oil 249, 639
Uniformity 642
Unitizing drillsite leases 120